UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

August 29, 1995

HAND DELIVERED

Steven Cohen
Lawrence Cohen
Chicago International Exporting
Chicago International Chicago, Inc.
4004-4020 South Wentworth
Chicago, Illinois 60609

RE: Standard Scrap Metal/Chicago International Exporting Site, Chicago, Illinois

Dear Messrs. Cohen:

As the United States Environmental Protection Agency (U.S. EPA) recently indicated to your counsel, Mr. Joseph Nassif, during a telephone conversation on August 28, 1995, U.S. EPA has reason to believe that the on-going operations at the above referenced Site are currently causing the release or threat of release of hazardous substances not only from the metal shredding/separating operation, but also from the "motors-in-motors-out" portion of the operations. U.S. EPA has recently confirmed sample results which indicate that dirt, dust and debris from loads of electric motors, which are whole and unshredded, are contaminated with up to 190 ppm PCBs and 5800 ppm total lead. These samples were taken from grid location E-13 which includes the new concrete pad constructed in March of 1995 following EPA's removal of contaminated soil and debris from that area. See Attached sampling results.

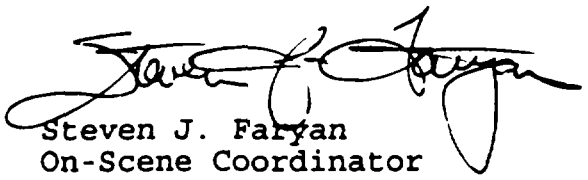
Therefore, U.S. EPA requires that the Respondents to the Unilateral Administrative Order Docket No. 95-C-283 ("UAO") amend the approved Air and Materials Sampling Plan and Operating and Contingency Plan to include sampling and managing the "motors-in-motors-out" portion of the on-going operations at the Site. U.S. EPA recommends that Respondents request a meeting with U.S. EPA and Respondents' consultant, International Engineers, Inc. to discuss the appropriate scope of an amended Air and Materials Sampling Plan and Operating and Contingency Plan.

Please notify the undersigned by no later than September 5, 1995 of a convenient time for such a meeting to take place the week of September 11-15, 1995.

As a reminder, the UAO requires the Respondents to cease any operations at the Site which releases or causes a threat of release of any hazardous substance into the air or onto the surface of the Site unless and until Respondents install and implement dust emission control equipment sufficient to ensure that there will be no such release, or threat of release of hazardous substances. This requirement applies to the "motors-in-motors-out" operations, as well as the metal shredding and separating processes at the Site.

If you have any questions, please do not hesitate to call me at (312) 353-9351.

Sincerely yours,



Steven J. Faryan
On-Scene Coordinator
United States Environmental Protection Agency

cc: Joseph G. Nassif
Coburn & Croft
Suite 2900
One Mercantile Center
Saint Louis, Missouri 63101
FAX (314) 621-2989

IEA
An Aquarion Company

Client: Riedel Environmental
IEA Job#: CH951062
Project #: 8157

RCRA/TCL
PCB's
mg/kg (dry weight)

Matrix: Soil
Method: 8080

Compound						Lower Limits of Detection (LLD) with no Dilution
Dilution Factor (DF)	10	40	1	4	10	
Method Blank	PS0807	PS0807	PS0807	PS0807	PS0807	
Client ID	MYE 13-Pad	MYE 13-Pad	MYG 14-Confirm	MYH 16-Surface	MYH 16-Surface	
Lab ID	951062 001 D	951062 001 D1	951062 002	951062 003 D	951062 003 D1	
Aroclor - 1016	UD	UD	U	UD	UD	0.8
Aroclor - 1221	UD	UD	U	UD	UD	0.8
Aroclor - 1232	UD	UD	U	UD	UD	0.8
Aroclor - 1242	130E	190	U	48E	56	0.8
Aroclor - 1248	UD	UD	6.5	UD	UD	0.8
Aroclor - 1254	29	UD	2.9	12	UD	1.6
Aroclor - 1260	UD	UD	2.4	UD	UD	1.6
Total Aroclors	159E	190	11.8	60E	56	7.2
Date Extracted	08/07/95	08/07/95	08/07/95	08/07/95	08/07/95	
Date Analyzed	08/08/95	08/08/95	08/08/95	08/08/95	08/08/95	

* MDL (Minimum Detection Limit) = LLD x DF

IEA
An Aquarion Company

Client: Riedel Environmental
IEA Job#: CH951062
Project #: 8187

RCRA/TCL
PCB's
mg/kg (dry weight)

Matrix: Soil
Method: 8080

						Lower Limits of Detection (LLD) with no Dilution
Dilution Factor (DF)	1					
Method Blank	PS0607					
Client ID	Method Blank					
Compound / Lab ID	PS0607					
Aroclor - 1016	U					0.8
Aroclor - 1221	U					0.8
Aroclor - 1232	U					0.8
Aroclor - 1242	U					0.8
Aroclor - 1248	U					0.8
Aroclor - 1254	U					1.6
Aroclor - 1260	U					1.6
Total Aroclors	U					7.2
Date Extracted	06/07/95					
Date Analyzed	06/08/95					

* MDL (Minimum Detection Limit) = LLD x DF

IEA
An Aquarion Company

CLIENT: RIEDEL ENVIRONMENTAL
CLIENT PROJECT#: 8157
CLIENT P.O.#: -
IEA PROJECT#: CH951062
MATRIX: SOIL

METALS

3 ID#	CLIENT ID	ANALYTE	RESULT	PQL	UNITS	DIL. FACTOR	DATE DIGESTED	DATE ANALYZED	METHOD
1062001	NY813-RAD								
		Cadmium	19	0.6	mg/kg	1	06/08/95	06/08/95	6010
		Lead	5800	6	mg/kg	1	06/08/95	06/08/95	6010
	Date Sampled: 06/07/95	95 Percent Solid							
1062002	NY814-CONFIRM								
		Cadmium	44	0.53	mg/kg	1	06/08/95	06/08/95	6010
		Lead	4700	5.3	mg/kg	1	06/08/95	06/08/95	6010
	Date Sampled: 06/07/95	83 Percent Solid							
1062003	NY815-SURFACE								
		Cadmium	28	0.53	mg/kg	1	06/08/95	06/08/95	6010
		Lead	3800	5.3	mg/kg	1	06/08/95	06/08/95	6010
	Date Sampled: 06/07/95	88 Percent Solid							

RIEDEL ENVIRONMENTAL SERVICES, INC.
ERCS REGION V
QA/QC DATA REVIEW

TO:	Steve Faryan, EPA OSC
FROM:	Todd Ritsema, TAD Coord, Smith Env.
THRU:	Dan Wilson, QA Mgr, Smith Env.
PROJECT:	Standard Scrap
JOB NO.	8150
REFERENCE:	MYE13-Pad, MYH14-Confirm, MYH15-Surface
METHODS:	GC-8080, Metals 6010

Per Chain of Custody: Total Lead and Cadmium 6010/7000; PCB's 8080/8

The following two tier review is based on information outlined in OSWER Directive 9360.4-01 (April 1990), Data Validation Procedures. The document is intended for guidance in assessing and substantiating data for various users.

I.	METALLIC INORGANIC PARAMETERS

A. Holding Times:
Sampled: 6/7/95; Received by lab 6/7/95
Date Analyzed: 6/8/95
(Acceptable — circled) / No Action / Action

B. Initial and Continuing Calibration:
ICB/CCB <0.0050 mg/l for Cad
ICB/CCB <0.0500 mg/l for Pd
ICV/CCV % Recovery 101-106% for Cad
ICV/CCV % Recovery 103-104% for lead
(Acceptable — circled) / No Action / Action

C. ~~Method Blank:~~ Dup MS/MSD/Surrogates:
Cadmium: % RPD For Sample Dup = 4.0[illegible], MSD 1.94, Serial Dilution Result ICAP = <50X PQL
Lead: % RPD For Sample Dup = 10.7742, MSD = 17.00; Serial Dilution Result ICAP 15.02852
(Acceptable — circled) / No Action / Action

D. ICS Sample Provided:
ICP Interference Check Sample (ICS) provided
(YES — circled) / NO

E. ~~MS/MSD/Surrogates:~~ Dup Method Blank:
Cadmium Prep Blank = <.005; LCS = 0.4[illegible], Known = 0.[illegible]
Lead LCS = <0.050; LCS = 0.4834, Known 0.5000
% Rec 97.7 Cadmium
91.6 Lead
(Acceptable — circled) / No Action / Action

II. GC/MS ANALYSIS: BNAs SVOCs VOCs PESTICIDES **PCBs** (circle one)

A. Holding Times:

Collected 6-7-95, extracted 6-7-95 and analyzed 6-7-95, 6-8-95, 6-9-95

Acceptable / No Action / Action

B. Instrument Performance:

Standard chromatogram shows adequate peak resolution.

Acceptable / No Action / Action

C. Initial and Continuing Calibration:

Initial cal. was done on 4-[illegible]-95 using all target analytes at five diff. concentrations %D < 15% as required between initial and cont. cal. CCC provided

Acceptable / No Action / Action

D. Method Blanks:

No contaminants were found in the blank (recovery 110%)

Acceptable / No Action / Action

E. MS/MSD/Surrogates:

MS/MSD could not be calculated due to high concentration of Ar 1254. A total of two surrogates were added to the samples, acceptable recovery.

Acceptable / **No Action** / Action

F. Compound Identification:

Analytes result were identified using correct retention time, peak height ratios and fingerprint pattern. Second column confirmation verification

Acceptable / No Action / Action

G. Compound Quantitation and Detection Limits:

Compound quantitation and detection limits have been correctly adjusted to reflect changes due to difference dry weight factors and dilution.

Acceptable / No Action / Action

III. INORGANIC PARAMETERS (ie. pH, TOC, etc.)

N/A.

IV. OVERALL ASSESSMENT OF THE DATA

BASED UPON THE INFORMATION PROVIDED, THE DATA IS CONSIDERED ACCEPTABLE, NOT ACCEPTABLE FOR USE AS REPORTED.

COMMENTS:
① MS/MSD not calculated due to high Ar1254 concentration.

[signature]
Reviewer
T+D Coord.
Title
7-17-95
Date

[signature] David J Wilson
Reviewer
QA Manager
Title
8-14-95
Date